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ATTORNEYS FOR PLAINTIFF
K.D., A MINOR, BY AND THROUGH HIS
GUARDIAN AD LITEM, LAQUANTAE DAVIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

K.D., a minor, by and through his
Guardian ad Litem, LAQUANTAE
DAVIS,

Plaintiff,

v.

CALIBER CHANGEMAKERS
ACADEMY, VALLEJO CITY UNIFIED
SCHOOL DISTRICT, RACHAEL
WEINGARTEN, AISHA FORD and
DOES 1-50 inclusive,

Defendants.

Case No. 2:23-cv-00083-DJC-JDP

**STIPULATED REQUEST AND
ORDER TO SHORTEN TIME TO
HEAR PLAINTIFF'S MOTION TO
APPROVE [L.R. 144(e)]**

**Hon. Daniel J. Calabretta
Magistrate Jeremy D. Peterson**

Plaintiff K.D. and Defendant Caliber Changemakers Academy, by and through
their undersigned counsel, hereby stipulate as follows:

1. Plaintiff and Defendant Caliber Changemakers Academy reached a
settlement in August 2025;
2. The settlement terms agree for payment from Defendant Caliber to
Plaintiff in exchange for a full dismissal of his claims against all defendants;
3. Plaintiff filed a motion to approve on September 22, 2025, but the Court

1 did not assign a hearing date to hear Plaintiff's Motion to Approve until November
2 20, 2025;

3 4. Plaintiff seeks earlier resolution of this matter for reasons articulated in
4 the underlying Motion; to wit, to facilitate prompt treatment of K.D.'s mental health
5 issues, which include recent mental health crises, and to ensure K.D. is housed in the
6 short term to allow his mother to return to full time employment. *See* ¶¶ 8-10 of
7 Plaintiff's Motion to Approve. As explained more fully in Plaintiff's motion to
8 approve, a portion of the funds will be placed in the Legacy Enhancement Minor's
9 Master Pooled Trust fbo K.D. and will be used to pay for therapy and mental health
10 services that Plaintiff needs in the immediate short term. Without these funds,
11 Plaintiff's guardian has no other way to pay for the specialty mental health services
12 that Plaintiff requires;

13 5. Plaintiff accordingly seeks that the Court promptly decide the Motion on
14 the papers without hearing, or alternatively shorten time to hear the Motion in early
15 October. Defendant Caliber Changemakers Academy does not oppose Plaintiff's
16 underlying Motion, does not oppose the Court deciding the Motion on the papers, and
17 alternatively does not oppose shortening time on hearing the Motion.

18 6. There is no prejudice to either party to provide Plaintiff the requested
19 relief, whereas Plaintiff will suffer severe prejudice should because the relief not be
20 provided;

21 IT IS SO STIPULATED.
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1 Dated: September 29, 2025

WALKUP, MELODIA, KELLY & SCHOENBERGER

2
3 By: /s/ Kelly L. Ganci

4 KHALDOUN A. BAGHDADI

5 VALERIE N. ROSE

6 KELLY L. GANCI

7 Attorneys for PLAINTIFF

8 K.D., A MINOR, BY AND THROUGH HIS

9 GUARDIAN AD LITEM, LAQUANTAE

DAVIS

10 Dated: September 29, 2025

GORDON REES SKULLY MANSUKHANI

11
12 By: /s/ Mark Julius

13 MARK JULIUS

14 Attorney for DEFENDANT CALIBER

15 CHANGEMAKERS

ORDER

Based on the foregoing stipulation and in the interests of justice, Plaintiff's Motion to Approve Settlement of Minor's Claims, ECF No. 105, is ORDERED submitted without appearance and without oral argument pursuant to Local Rule 230(g). As such, the hearing on said motion, set for November 20, 2025, is VACATED. If the Court subsequently concludes that oral argument is necessary, a hearing will be set and the parties notified accordingly.

Dated: September 29, 2025

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE